

## Exhibit E



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FILE NO: 29073.396

August 17, 2011

Omid H. Nasab, Esq.  
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825 Eighth Avenue  
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**Georgia-Pacific Consumer Products LP, et al. v. NCR Corp., et al.**

Dear Mr. Nasab:

I am responding to your letter of August 15, 2011 to Tara Falsani.

We find it unusual that NCR has not served a request for production of documents, yet complains about Georgia-Pacific moving forward with depositions before it has done so and further complains about the documents GP has produced, voluntarily. The irony is compounded by the position that NCR took prior to the status conference with Judge Jonker, namely, that all fact discovery relevant to the issues NCR proposed in Phase IA was to be completed by September 9, 2011.

GP voluntarily provided to the defendants, without a request for production, over 800 pages of documents that are relevant to the potential testimony of Messrs. Martin and Lacey. We provided these documents when we did as a courtesy to the defendants so that they would not see them for the first time at the depositions, not because we were requested or otherwise obligated to do so. The documents we sent to you comprise all documents in the custody or control of Messrs. Lacey and Martin of which GP is aware that are relevant to the issues in this case. We also produced all the documents that I referred to during the June 27 status conference with Judge Jonker or, where NCR already had the documents, described them.

In short, GP has not “failed to produce documents.” There are no “missing documents.” NCR is and has been free to serve a document request on GP, and we will respond. In the meantime, we look forward to seeing counsel for NCR and the other defendants at the depositions of Messrs. Lacey and Martin on August 30 and 31. As I have said in two prior communications with Darin McAtee, we do not



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anticipate that additional documents that you may obtain through the discovery process will support the need for further depositions of Messrs. Martin and Lacey. But that is not an issue that needs to be resolved now.

Yours very truly,

A handwritten signature in dark ink, appearing to read "Joe Kearfott", written over the typed name.

Joseph C. Kearfott

JCK/gba

cc: Counsel of record